

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	CRIM. NO. 04-30032-MAP
)	
vs.)	VIOLATIONS:
)	
FRANCIS G. KEOUGH, III)	18 U.S.C. § 1951 -
)	Extortion (Count One)
<u>Defendant.</u>)	
		18 U.S.C. § 1503 - Obstruction
		of Justice (Counts Two, Five,
		Eight and Ten)
		18 U.S.C. § 1001 - Making a
		False Statement (Counts Three
		and Four)
		18 U.S.C. § 1512 - Witness
		Tampering (Counts Six, Seven,
		Nine and Eleven)

The Grand Jury charges:

SUPERSEDING INDICTMENT

COUNT ONE: Title 18, United States Code, Section 1951 -
Extortion

Between on or about April 23, 1999 and December 8, 1999, in
the District of Massachusetts,

FRANCIS G. KEOUGH, III

defendant herein, did knowingly, willfully, and unlawfully affect
and attempt to affect interstate commerce and the movement of
articles and commodities in interstate commerce by extortion, in
that the defendant unlawfully obtained \$29,000.00 from The Ware
Group, Inc., which property was not due the defendant and The

Ware Group's consent having been induced by wrongful use and threat of use of economic harm and under color of official right.

All in violation of Title 18, United States Code, Section 1951.

**COUNT TWO: Title 18, United States Code, Section 1503 -
Obstruction of Due Administration of Justice**

From on or about December 16, 2002, through or about April 29, 2003, within the District of Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did corruptly obstruct and impede, and endeavor to obstruct and impede, the due administration of justice by making a series of false statements to a Special Agent of the Federal Bureau of Investigation about how he had paid for the construction of his residence in Charleston, Rhode Island in order to have his name removed from grand jury subpoenas being issued on behalf of the federal grand jury.

All in violation of Title 18, United States Code, Section 1503.

**COUNT THREE: Title 18, United States Code, Section 1001 -
False Statement to a Federal Agent**

On or about April 8, 2003, within the District of
Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, in a matter within the jurisdiction of the
Federal Bureau of Investigation, United States Department of
Justice, did knowingly and willfully make a false, fraudulent,
and fictitious material statement and representation; that is
falsely stating to a Special Agent of the Federal Bureau of
Investigation in substance that no money from the Friends of the
Homeless, Inc. was ever used for the construction of his house in
Charleston, Rhode Island.

All in violation of Title 18, United States Code, Section
1001.

**COUNT FOUR: Title 18, United States Code, Section 1001 -
False Statement to a Federal Agent**

On or about April 29, 2003, within the District of
Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, in a matter within the jurisdiction of the
Federal Bureau of Investigation, United States Department of
Justice, did knowingly and willfully make a false, fraudulent,
and fictitious material statement and representation; that is
falsely stating to a Special Agent of the Federal Bureau of
Investigation in substance that he had paid for everything used
for the construction of his house in Charleston, Rhode Island
that he had received from a local building supply company.

All in violation of Title 18, United States Code, Section
1001.

**COUNT FIVE: Title 18, United States Code, Section 1503 -
Obstruction of Due Administration of Justice**

From on or about March 16, 2004, through September 21, 2004,
within the District of Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did corruptly obstruct and impede, and endeavor
to obstruct and impede, the due administration of justice by
causing Witness A to testify falsely about personal work
performed at defendant Francis G. Keough's residence in
Charleston, Rhode Island while on Friends of the Homeless, Inc.
time and the use of inmates from the Hampden County House of
Corrections to perform personal work on defendant Francis G.
Keough's personal and rental residences.

All in violation of Title 18, United States Code, Section
1503.

**COUNT SIX: Title 18, United States Code, Section 1512 -
Witness Tampering**

From on or about March 16, 2004, through September 21, 2004,
within the District of Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did knowingly corruptly persuade and attempt to
corruptly persuade Witness A with the intent to influence the
testimony of Witness A in a federal grand jury proceeding by
telling Witness A in substance that Witness A should testify that
Witness A worked at defendant Francis G. Keough's residence in
Charleston, Rhode Island while on personal time, and that Witness
A exercised bad judgment and was at fault for allowing Hampden
County House of Corrections inmates to perform personal work.

All in violation of Title 18, United States Code, Section
1512.

**COUNT SEVEN: Title 18, United States Code, Section 1512 -
Witness Tampering**

In or about late, 2004, or early, 2005, within the District of Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did knowingly corruptly persuade and attempt to corruptly persuade Witness A with the intent to influence the testimony of Witness A in an official proceeding by asking Witness A to tell the Federal Bureau of Investigation that Witness A personally observed defendant Francis G. Keough give \$30,000.00 in cash to the owner of The Ware Group, Inc.

All in violation of Title 18, United States Code, Section 1512.

**COUNT EIGHT: Title 18, United States Code, Section 1503 -
Obstruction of Due Administration of Justice**

On or about June 14, 2005, within the District of
Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did corruptly obstruct and impede, and endeavor
to obstruct and impede, the due administration of justice by
telling Witness B in substance to testify falsely about Witness
B's living situation at the time Witness B enrolled in the ISSI
program, and not to mention the fact that he had tenants living
in the basement at 24-26 Palmer Avenue, Springfield,
Massachusetts.

All in violation of Title 18, United States Code, Section
1503.

**COUNT NINE: Title 18, United States Code, Section 1512 -
Witness Tampering**

On or about June 14, 2005, within the District of
Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did knowingly corruptly persuade and attempt to
corruptly persuade Witness B with the intent to influence the
testimony of Witness B in a federal grand jury proceeding by
telling Witness B in substance that Witness B should testify that
Witness B was homeless at the time that Witness B enrolled in the
ISSI program, and that Witness B should not mention the fact that
he had tenants living in the basement at 24-26 Palmer Avenue,
Springfield, Massachusetts.

All in violation of Title 18, United States Code, Section
1512.

**COUNT TEN: Title 18, United States Code, Section 1503 -
Obstruction of Due Administration of Justice**

In or about June, 2005, within the District of
Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did corruptly obstruct and impede, and endeavor
to obstruct and impede, the due administration of justice by
telling Witness C in substance that he protects his friends, that
everyone should get on the same page, and that if Witness C
wanted to say that Witness C was homeless at the time that
Witness C enrolled in the ISSI program, then he would back up
Witness C.

All in violation of Title 18, United States Code, Section
1503.

**COUNT ELEVEN: Title 18, United States Code, Section 1512 -
Witness Tampering**

In or about June, 2005, within the District of
Massachusetts,

FRANCIS G. KEOUGH, III,

defendant herein, did knowingly corruptly persuade and attempt to
corruptly persuade Witness C with the intent to influence the
testimony of Witness C in a federal grand jury proceeding by
telling Witness C in substance that he protects his friends, that
everyone should get on the same page, and that if Witness C
wanted to say that Witness C was homeless at the time that
Witness C enrolled in ISSI program, then he would back up Witness
C.

All in violation of Title 18, United States Code, Section
1512.

A TRUE BILL



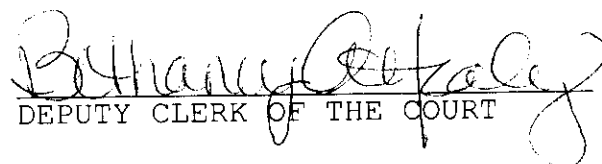
FOREPERSON OF THE GRAND JURY



Assistant United States Attorney

DISTRICT OF MASSACHUSETTS: JULY 28, 2005 at 3:56pm

Returned into the District Court by the Grand Jurors and filed.



DEPUTY CLERK OF THE COURT